

REMARKS

The instant Amendment B is responsive to the Office Action mailed March 7, 2005, which was made final. This Amendment B is being submitted in conjunction with a Request for Continued Examination. Applicants respectfully submit that claims 1-8, 10-12, 14-22, 24-26, and 28-41 as set forth herein patentably distinguish over the cited references, and accordingly ask for allowance of claims 1-8, 10-12, 14-22, 24-26, and 28-41 as set forth herein.

The current status of the claims

Claims 1, 3, 4, 6-8, 10-18, 28-34, 36, 38, and 39 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Rochford et al., U.S. 6,691,282 (hereinafter "Rochford").

Claim 35 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Rochford.

Claims 2, 5, 19, 20, 24-26, and 41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Rochford in view of Sklar et al., U.S. 5,790,121 (hereinafter "Sklar").

Claims 21 and 22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Rochford in view of Sklar in further view of Novik, U.S. 6,339,745 (hereinafter "Novik").

Claims 37 and 40 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Rochford in view of Novik.

Claims 1-8 and 40 patentably distinguish over the references of record

Claim 1 as set forth in previous Amendment A calls for displaying in a document pane at least a portion of a current object, displaying in a map pane a K-map, and displaying in a preview pane contents associated with a preview object selected from the K-map, wherein the document pane, map pane, and preview pane are displayed simultaneously on a single display device.

The Office Action rejects claim 1 based on Rochford figs. 4A-4E and associated text. Rochford figures 4A-4E appears to show three panes labeled (30-38), (40), (50). The Office Action expressly interprets the lower right-hand panel (30-38) as allegedly corresponding to the preview pane of the present application (at least at Office Action at pages 3, 5, and most expressly at page 17 where it is stated that "Examiner interprets window 32 to be a preview window."). However, the Office Action is unclear, and sometimes contradictory, as to which of the Rochford panes (40), (50)

corresponds to the map pane of the present application, and which of the Rochford panes (40), (50) corresponds to the document pane.

For example, in rejecting claim 3, the Office Action appears to interpret "updating the K-map" as corresponding to modifying the contents of pane (30, 32). But, the pane (30, 32) is expressly interpreted elsewhere in the Office Action as the preview pane, not the map pane. In rejecting claim 4, the Office Action interprets the "Show by:" radial selectors of pane (40) as being the K-map selector of claim 4, which would appear to suggest that here pane (40) is being interpreted as the K-map pane. In rejecting claim 6, the Office Action at page 4 first appears to interpret "receiving a selection of an updated current object identity ... through the K-map pane" as corresponding to select/zoom operations operable in pane (50), suggesting pane (50) is the map pane. However, later in the explanation of the rejection of the same claim, "updating the K-map to include objects related to the current object" appears to be interpreted as updating of the list of countries in pane (32). In rejecting claim 7, the Office Action interprets "receiving a selection of an update preview object identity ... through the K-map pane" as corresponding to user input selection from a list. Since pane (50) does not list anything, this would appear to preclude pane (50) from being the map pane. Thus, in rejecting claims 3, 4, 6, and 7, it appears the each of the panes (30-38), (40), and (50) is interpreted at various times as being the map pane.

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior reference. MPEP § 2131. Since Rochford only shows three panes, with pane (30-38) expressly interpreted in the Office Action as the preview pane, there must be an unambiguous one-to-one correspondence between the remaining two Rochford panes (40), (50) and the remaining K-map and document panes of claim 1, in order for Rochford to anticipate claim 1. Claim 1 calls for three panes, displayed simultaneously on a single display device.

If the anticipation rejection of claim 1, 3, 4, and 6-8 are to be maintained in the forthcoming Office Action, Applicants respectfully request an unambiguous clarification of:

- (i) Which of the Rochford panes (30-38), (40), (50) is interpreted as the preview pane?;
- (ii) Which of the Rochford panes (30-38), (40), (50) is interpreted as the map pane?; and
- (iii) Which of the Rochford panes (30-38), (40), (50) is interpreted as the document pane?

Regarding claim 2, the Office Action acknowledges at page 11 that Rochford fails to teach a non-hierarchical node view, and proposes to modify Rochford by Sklar to allegedly provide this

element of claim 2. It is respectfully submitted that the references provide no motivation for making such an extensive modification of Rochford.

Rochford is directed toward an improved interface for drilling through a hierarchy to find a file. In previous hierachal interfaces (e.g., Rochford Fig. 2), many folders and files which do not contain and are not contained by the folder or file of interest are nonetheless displayed. Rochford overcomes this problem by not displaying any folder from the hierarchy that does not contain the file or folder of interest, and by not displaying sibling files or folders. These modifications to the usual hierarchical display produces in the display of Rochford Fig. 3.

Since the intended purpose of Rochford is to efficiently display a hierarchical view, the proposed substitution of a node view for Rochford's hierachal view would render Rochford unfit for its intended purpose of drilling through a hierarchy. Because the proposed modification would render Rochford unfit for its intended purpose, there is no suggestion or motivation to make the proposed modification. MPEP § 2143.01.

Regarding claim 5, the Office Action acknowledges at page 12 that Rochford "fails to teach the interface which are cataloged in the knowledge portal as including content related to the K-map object and having a strength of relationship respective to the K-map object within the updated K-map scope", and proposes to modify Rochford by Sklar to allegedly provide this element of claim 5.

However, such a modification would again render Rochford unsatisfactory for its intended purpose. Rochford teaches not displaying any folder from the hierarchy that does not contain the file or folder of interest, and not displaying sibling files or folders, so as to produce a more compact hierachal display. How would one go about "modifying" Rochford to include a strength of relationship aspect? Such a modification would appear to necessitate displaying sibling files or folders, or portions of the hierarchy that do not contain the folder of interest. Such a modification would obviate the teachings of Rochford.

Regarding claim 40, the Office Action states that claims 37 and 40 are rejected under § 103(a) in view of Rochford, but apparently intends to reject these claims under a combination of Rochford and Novik, since both are referenced in the written explanation. The Office Action at page 16 provides a written explanation of the rejection of claim 37 only. It then states that the scope of claim 40 is of the same scope as claim 37, so that the explanation of the rejection of claim 37 applies to claim 40 as well.

Respectfully, it is submitted that claims 37 and 40 do not have the same scope. Claim 37 calls for updating the preview object without affecting the current object display pane. Claim 40 calls for the preview pane contents to be metadata stored in the knowledge portal rather than the preview object itself. The alleged anticipation of claim 37 does not imply that claim 40 is anticipated.

Based on the foregoing, it is respectfully submitted that claims 1-8 and 40 patentably distinguish over the cited references. Accordingly, Applicants respectfully request allowance of claims 1-8 and claim 40.

Claims 10-12 and 14-18 patentably distinguish over the references of record

Claim 10 calls for, *inter alia*, displaying in a document pane at least a portion of the current object, displaying in a map pane the K-map, and displaying in a preview pane contents associated with the preview object. This claim stands rejected as anticipated by Rochford. Applicants' comments pertaining to claim 1 apply here as well. If the anticipation rejection of claim 10 is to be maintained, Applicants respectfully request unambiguous clarification of which of the Rochford panes (30-38), (40), (50) correspond to each of the preview pane, map pane, and document pane of claim 10.

Claim 11 has been amended to call for the K-map view selector to have at least a node view selection option and a tree view selection option. Since the Office Action acknowledges at page 11 that Rochford fails to teach a non-hierarchical node view of the K-map, Rochford cannot teach a view selector that includes a tree view selection option and a node view selection option.

Claim 12 has been amended to call for the class selector including at least a people class selection option, a places class selection option, and a things class selection option. None of the cited references disclose or suggest a class selector including these selection options.

Claim 13 is canceled herein.

Claim 17 calls for, *inter alia*, receiving a text entry supplied through user highlighting of text in the document display pane. This claim stands rejected as anticipated by Rochford, stating that Rochford provides a search window which allows a user to enter a textual search criterion. Respectfully, text entry in a search window is not equivalent to highlighting. Text entry is tedious, requiring the user to type in the user input. Highlighting is simple, and allows the user to select the user input from what is already displayed on the screen. Highlighting is advantageous with the

contextual linking provided by a knowledge portal, since it allows the user to easily identify context in the current document for updating the contextual K-map. Applicants find no mention in Rochford of highlighting text in a document display pane to supply a user entry.

Claim 18 calls for simultaneously displaying the document pane, the map pane, and the preview pane on a single display device. The Office Action rejects this claim as anticipated by Rochford Fig. 4A, without identifying which of the panes (32), (40), (50) is interpreted as corresponding to which of the three panes called out in claim 18. The Office Action also cites "items 9, and 14" – Applicants find no such reference characters in Rochford.

Based on the foregoing, it is respectfully submitted that claims 10-12 and 14-18 patentably distinguish over the cited references. Accordingly, Applicants respectfully request allowance of claims 10-12 and 14-18.

Claims 19-22, 24-26, and 41 patentably distinguish over the references of record

Claim 19 calls for, *inter alia*, generating a knowledge portal catalog cataloging data objects based on content, the knowledge portal contextually linking the objects based on document content, and constructing a K-map identifying related objects having content related to a K-map object as measured by a strength of relationship between the related object and the K-map object. The subject matter added by amendment is supported in the original specification at least at page 2 lines 15-16.

The Office Action acknowledges at page 13 that Rochford fails to teach measuring the strength of relationship between objects, and proposes modifying Rochford by Sklar which is alleged to teach an interface which are cataloged in the knowledge portal as including content related to the K-map object and having a strength of relationship respective to the K-map object with the updated K-map scope.

First, Applicants respectfully submit that Rochford does not disclose or fairly suggest generating a knowledge portal. The Office Action is correct in stating at page 17 that "limitations from the specification are not read into the claims" (see also MPEP § 2111). However, "[t]he broadest reasonable interpretation of the claims must also be consistent with the interpretation that those skilled in the art would reach." MPEP § 2111. The background of the present application sets forth the understanding in the art that a knowledge portal is different from a hierachal directory tree structure. To recognize that the term "knowledge portal" in claim 19 is distinct from the hierarchical

directory tree of Rochford does not import limitations from the specification; it merely recognizes the interpretation of the term "knowledge portal" that those skilled in the art would reach. The amendment is intended to more clearly distinguish the knowledge portal of claim 19 from the file folder hierarchy of Rochford.

Claim 19 also calls for constructing a K-map (i.e., "knowledge map") identifying related objects having content related to a K-map object as measured by a strength of relationship between the related object and the K-map object. The constructing of the K-map is enabled by the generated knowledge portal, which provides the contextual links for determining strength of relationship. Without the knowledge portal, there would be no basis for determining a strength of relationship between the related object and the K-map object. Accordingly, any "strength of relationship" concept allegedly found in Sklar cannot be grafted onto the hierarchical directory tree of Rochford without extensive modification of Rochford, including at least the generating of a knowledge portal.

Claim 20 is rejected in the Office Action at page 13 based on the proposed combination of Rochford and Sklar. However, the written explanation of this rejection appears to address the subject matter of claim 21. If the stated rejection of claim 20 is to be maintained, Applicants respectfully request a written explanation of the rejection in the forthcoming Office Action.

Claim 21 calls for the displayed K-map to include objects corresponding to a user-selectable K-map class selector value. The Office Action acknowledges that neither Rockford nor Sklar disclose the subject matter of claim 21, and proposes the further inclusion of Novik into the combination. The cited portion of Novik reads in its entirety:

Referring to FIG. 17, the routing function is illustrated. The routing function is a scheduling function where the user can set up a schedule for a vehicle. Using the routing function, the user can determine where a vehicle should be located at a specific time. If a vehicle is not at a specific location within a given time limit, an alarm can be setoff to inform the user that a vehicle is behind schedule. An alarm can also be setoff if a vehicle stays at a location for an extended period of time.

Novik, col. 11 line 65 through col. 12 line 6.

Respectfully, Applicants do not find in this passage, or in the referenced Fig. 17, anything related to a user selectable K-map selector value. The passage appears to relate to vehicle tracking.

Claim 22 calls for the K-map selector value to correspond to one of a people class, a places class, and a things class. This subject matter is rejected in the Office Action at page 16 based on Novik Fig. 15, specifically the "Track Name" drop-down box. Novik col. 11, lines 5-14, specify that tracking can be by name (i.e., people), or area (i.e., place). However, it does not suggest a "things" category, and such a category would appear to be irrelevant to Novik's vehicle tracking application. Moreover, it is not clear to Applicants how a selection drop-down box for identifying a tracked vehicle relates to the K-map class selector value called out in claim 22.

Regarding claim 24, the Office Action does not indicate how a proposed combination of Rochford and Sklar meet the elements of this claim. If the stated rejection of claim 24 is to be maintained, Applicants respectfully request a written explanation of the rejection in the forthcoming Office Action.

Claim 26 calls for highlighting text. The comments herein pertaining to claim 17 apply here as well.

Based on the foregoing, it is respectfully submitted that claims 19-22, 24-26, and 41 patentably distinguish over the cited references. Accordingly, Applicants respectfully request allowance of claims 19-22, 24-26, and 41.

Claims 28-39 patentably distinguish over the references of record

Claim 28 calls for a current object display pane for displaying at least a portion of the current object, a K-map display pane for displaying the K-map, and a preview pane different from the current object display pane for displaying contents corresponding to a preview object. Again, if the anticipation rejection of this claim based on Rochford is to be maintained, Applicants respectfully request that the forthcoming Office Action unambiguously identify the separate object display pane, preview pane, and K-map display pane in Fig. 4a of Rochford.

Claim 28 further calls for a K-map processor for calculating a K-map corresponding to a current object and a set of K-map parameters, the K-map identifying objects indicated by a catalog of the knowledge portal as having content related to the current object. Claim 28 is amended herein similarly to the amendment of claim 19 to clarify the distinction between the knowledge portal of

claim 28 and the file folder hierarchy of Rochford. Applicants again respectfully submit that Rochford does not disclose or fairly suggest a knowledge portal. Without a knowledge portal, Rochford cannot disclose a K-map identifying objects indicated by a catalog of the knowledge portal as having content related to the current object.

Claim 29 calls for the K-map display pane to display the K-map in a non-hierarchical node view. This claim stands rejected as anticipated by Rochford, citing the pane (30) of Rochford Fig. 4a as showing a node view. However, the Office Action acknowledges at page 11 that Rochford fails to teach a non-hierarchical node view. Moreover, the pane (30) is generally interpreted in the Office Action as corresponding to the preview pane, not the K-map pane.

Based on the foregoing, it is respectfully submitted that claims 28-39 patentably distinguish over the cited references. Accordingly, Applicants respectfully request allowance of claims 28-39.

CONCLUSION

In view of the foregoing amendments and remarks, it is respectfully submitted that claims 1-8, 10-12, 14-22, 24-26, and 28-41 as set forth herein are in condition for allowance. Notice to that effect is respectfully requested at the earliest possible date.

Respectfully submitted,

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